

EXHIBIT 10

1 EXAMINATION

2 BY MR. BROWN:

3 Q. Please state your full name for the record.

4 A. Michael Leon Barnes.

5 Q. Mr. Barnes, my name is Bruce Brown. We
6 have met.

7 What is your current position?

8 A. I am currently employed with the Secretary
9 of State's office where I serve as the Director for
10 the Center for Election Systems.

11 Q. How long have you been the Director of the
12 Center of Election -- for Election Systems?

13 A. At the Secretary of State's office, I
14 started back with the Secretary of State's office on
15 January 1 of 2018.

16 Q. And what did you do before January 1, 2018?

17 A. Prior to moving back to the Secretary of
18 State's office, I was the Director for the Center for
19 Election Systems at Kennesaw State University where I
20 was employed by Kennesaw State from June 2005 through
21 December 31st, 2017.

22 Q. And focusing on your tenure at KSU --

23 A. Uh-huh.

24 Q. -- could you describe in general your
25 responsibilities?

1 A. As director, which I served as director
2 from 2010 through the Center's closing in 2017, I
3 oversaw the daily operations of the Center, managed
4 its ballot building operations, as well as its -- as
5 well as its Express Poll data set building and also
6 its training responsibilities for educating election
7 officials within the State.

8 Q. I want to ask you some general overview
9 questions about the Center in the 2016 time frame.

10 A. Okay.

11 Q. And the computers have been described in
12 different ways, but what I would like to ask you
13 about is what you have referred to as the servers.
14 Are you with me?

15 A. I believe so, yes.

16 Q. Okay. And what is a server?

17 A. A server in normal discussions is a
18 computer that is networked to the outside world.
19 Sort of like a web server. That is one definition of
20 a web -- of a server. But there -- in our
21 nomenclatures in educating election officials on use
22 of their voting equipment, we have referenced a
23 particular computer in use also as a server, but it
24 doesn't fit that same definition.

25 Q. And what is -- what is -- which one is that

1 personal information was compromised and that's just
2 not correct, right?

3 A. I'm only speaking to what's before me in
4 the document.

5 Q. Okay. But you would not agree that no
6 personal information was compromised.

7 A. I do not know if personal information was
8 compromised or not.

9 Q. But you know that millions of pieces of
10 data about people, including personal information,
11 was available on the Internet to be compromised for
12 many months, right?

13 A. I know that the Center for Election System
14 placed an Express Poll data set on its web server for
15 access for counties. Who gained access other than
16 the counties, I am unaware.

17 Q. But -- but -- well, just cutting to the
18 chase, you know, Mr. Lamb could get in, Mr. Grayson
19 could get in, Mr. Green, who was a professor at
20 Kennesaw, confirmed that all of this information had
21 been compromised and was vulnerable. Correct?

22 A. Based upon the documentation, yes, sir.

23 Q. Okay.

24 Okay. Let me direct your attention to page
25 64. Can you describe for me the process and the

1 people involved in deciding to wipe the two servers?
2 What do you know about that?

3 A. I know that the servers were in the
4 possession of Steven Gay, who was the head of KSU IT
5 and KSU IT had taken possession of the servers and
6 were in control of the servers at that point.

7 Q. But you knew what they were doing with it,
8 right?

9 A. I knew they had possession of the servers.

10 Q. And you knew that they were going to wipe
11 the servers, right?

12 A. It's my understanding that they had
13 intention of trying to reuse the servers in some
14 other capacity within the University.

15 Q. And to do that they were going to wipe the
16 servers of the election information.

17 A. I did not know what they were going to do
18 with the servers. I knew that they had possession of
19 the servers and had intent to reuse them in some
20 capacity outside the Center for Election Systems.

21 Q. And you didn't tell them to wipe it or to
22 save it.

23 A. I did not. I entrusted the protection of
24 the devices, that hardware, in the hands of KSU IT
25 because I felt like that was the best course of

C E R T I F I C A T E

STATE OF GEORGIA)

) ss.:

FULTON COUNTY)

I, Robin Ferrill, Certified Court Reporter
within the State of Georgia, do hereby certify:

That MICHAEL BARNES, the witness whose
deposition is hereinbefore set forth, was duly sworn
by me and that such deposition is a true record of
the testimony given by such witness.

I further certify that I am not related to
any of the parties to this action by blood or
marriage; and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 10th day of July, 2019.



ROBIN K. FERRILL, RPR